

I am concerned that the IBOC-DAB is not conducive to an effective free market, has technical problems, and will exacerbate the dissolution of communities bonds to the detriment of our democratic way of life.

IBOC-DAB will cause fewer people to be able to hear non-mainstream broadcasts by low power transmitters. Programming on low power transmitters often serve important community interests, as well as the interests of minorities and other marginalized populations. A study entitled "Evaluation of the iBiquity Digital Corporation IBOC System , Part I - FM IBOC" from December 3 2001 demonstrates a qualitative degradation of signal quality due to interference from IBOC-DAB.

The reason for placing DAB in the FM band is because the U.S. Military will not give up the L-Band, despite the fact that all other advanced countries realize the band is not secure enough for military purposes. We should join the rest of the world and join the Eureka 147 standard. The U.S. Military could more effectively use higher frequency bands for their telemetry testing.

Furthermore the IBOC-DAB would literally make hundreds of millions of radios worthless and require million of consumers to buy new equipment. There is not evidence that consumers are unhappy with the current state of technology; in fact Sony has commented to the FCC that DAB has a disappointingly slow market penetration in Europe. What is desired by consumers is more variety not marginally better audio.

The better solution is low power FM (LPFM). LPFM better serves the interests of community, because it provides forums for civic discussions that are not carried by large corporate owned stations. It better supports democracy and the free market by providing more choice to consumers. IBOC-DAB will result in fewer choices on the dial to listeners, and will ultimately contribute to the decline number of listeners on the FM band.

The FCC is charged with ensuring the publicly owned airwaves serve the public interest; therefore the best policy is to oppose any plan for mandatory conversion to IBOC-DAB and support low power FM.